

EXHIBIT 6

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 IN RE: NATIONAL) MDL No. 2804
5 PRESCRIPTION OPIATE)
6 LITIGATION) Case No.
7) 1:17-MD-2804
8)
9 THIS DOCUMENT RELATES TO) Hon. Dan A.
10 ALL CASES) Polster
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Monday, May 13, 2019

HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW

Videotaped Deposition of JAMES E.
RAFALSKI, held at Weitz & Luxenburg PC, 3011
West Grand Avenue, Suite 2150, Detroit,
Michigan, commencing at 9:20 a.m., on the
above date, before Michael E. Miller, Fellow
of the Academy of Professional Reporters,
Registered Diplomate Reporter, Certified
Realtime Reporter and Notary Public.

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1 before?

2 A. That's correct.

3 Q. You were introduced by the
4 plaintiffs' attorneys basically?

5 A. Yes, sir.

6 Q. Okay. And the phone call with
7 Mr. Whitehall was about what?

8 A. Well, my expert opinion has to
9 deal with the companies' actions and
10 compliance with regulations and the law, and
11 my -- I guess my understanding of what
12 Mr. Whitehill does is he looks at the
13 companies for more of a larger corporate type
14 of compliance, maybe how the companies set up
15 their compliance in more of a big, broader
16 overview.

17 I really didn't see any
18 connection between what his opinion was going
19 to be and my opinion, but at the request of
20 plaintiff counsels, we had a couple of
21 discussions.

22 Q. So you talked more than once?

23 A. Yes, sir.

24 Q. On the phone?

25 A. Yes, sir.